

**IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF NEW MEXICO**

KYLE BEEBE,

Plaintiff,

vs.

No. 1:19-CV-00545 JHR/JFR

JOHN TODD,

Defendant.

PLAINTIFF'S RULE 26 DISCLOSURES

COMES NOW Plaintiff Kyle Beebe submits these Rule 26 disclosures pursuant to F.R.C.P. Rule 26(a) as follows:

A. Rule 26(a)(1)(A)(i): See the witness disclosure by Plaintiff contained in the Joint

Status Report with the following additions:

3. Any witness identified by Defendant.
4. Any witness identified in Discovery.
5. Any foundation witnesses.
6. Any rebuttal witnesses.

B. Rule 26(a)(1)(A)(ii): See the categories of documents listed by Plaintiff in the Joint

Status Report.

C. Computation of damages: At this stage of the litigation and plaintiff's medical treatment the amounts of damage cannot be calculated but plaintiff will seek damages in an amount to be determined by the jury for medical treatment past and future, and past and future pain and suffering.

Respectfully submitted,

VALDEZ & WHITE LAW FIRM, LLC

/s/ Timothy L. White

Timothy L. White

PO Box 25646

Albuquerque, N.M. 87125

Phone: (505) 345-0289

Fax: (505) 345-2573

Email: tim@valdezwhite.com

CERTIFICATE OF SERVICE

The foregoing was emailed to all counsel of record on December 11, 2019:

Stephen Fernelius
Ryan M. Perdue
Fernelius Simon Mace Robertson Perdue PLLC
4119 Montrose Blvd, Suite 500
Houston, TX 77006
(713) 654-1200
steve.fernelius@trialattorneytx.com
ryan.perdue@trialattorneytx.com
Attorneys for Defendant

/s/Timothy L. White
Timothy L. White